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May 6, 2020

Via ECF

Hon. Robert W. Lehrburger (U.S.M.J., S.D.N.Y.)

**Re: *Avalon Holdings Corp. v. Gentile et. al.*, No. 18-cv-7291-VSB (S.D.N.Y.);
& *New Concept Energy, Inc. v. Gentile*, et. al., No. 18-cv-8896 (S.D.N.Y.)**

**Joint Request to extend the deadline for the
Stipulation as to payments/receipts from MintBroker transactions**

Your Honor:

On behalf of all parties, I thank the Court for addressing the discovery issues raised at the conference held on April 23, 2020.

Pursuant to the Court's Order following the conference, the parties were to stipulate to facts "concerning payments/receipts for transactions involving Defendant MintBroker during the relevant time period." (See Order, *Avalon* Dkt #58 & *New Concept* Dkt #41, at ¶3). Per the Court's Order, that Stipulation was to be prepared today, May 6, 2020.

The parties have been working together on a proposed Stipulation, which we anticipate may include additional facts that will further narrow outstanding areas of disagreement and promote a more efficient resolution of this case.

While our discussions of the issues are ongoing, the parties expect to agree to and file the Stipulation ordered by the Court within one week, or by May 13, 2020.

Plaintiffs and Defendants jointly request this extension until May 13, 2020 (or will revert to the Court if the Stipulation has not been finalized by then).

Respectfully,

s/ Miriam Tauber

Miriam Tauber
Attorney for Plaintiffs

cc: all counsel (via ECF)